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(12/04)

**UNITED STATES DISTRICT COURT  
for the  
District of New Jersey**

**U.S.A. vs. Keila Ravelo**

**Docket No. 15-576**

**Petition for Action on Conditions of Pretrial Release**

COMES NOW ELIZABETH G. CHARLESTON PRETRIAL SERVICES OFFICER, presenting an official report upon the conduct of defendant **Keila Ravelo**, who was placed under pretrial release supervision by the **Honorable Michael A. Hammer** sitting in the Court at **50 Walnut Street, Newark, New Jersey 07101**, on **December 22, 2014**, under the following bail and conditions:

Released on a \$500,000 appearance bond secured by a Florida condo, a retirement account and a painting worth \$125,000.

1. Pretrial Services Supervision.
2. Home Detention with location monitoring, pending perfection of the secured bond.
3. Surrender all passports/travel documents. Do not apply for new travel documents.
4. Travel restricted to New Jersey, unless otherwise approved by Pretrial Services.
5. Mental Health testing and/or treatment as directed by Pretrial Services.
6. Maintain current residence or a residence approved by Pretrial Services.
7. Surrender/do not possess any firearms. All firearms in any home in which the defendant resides shall be removed, in compliance with New Jersey state law, within 24 hours and verification provided to Pretrial Services. The defendant shall also surrender all firearm purchaser's identification cards and permits to Pretrial Services

On December 31, 2014, as the defendant satisfied the security for the bond imposed on December 22, 2014, Magistrate Judge Hammer ordered the removal of the condition of home detention with location monitoring from the defendant. All other bail conditions remain in full force and effect.

On December 3, 2015, the defendant appeared before Your Honor for Arraignment and a plea of Not Guilty was entered. Please find the previously submitted Release Status Report dated December 1, 2015, for Your Honor's review.

On November 20, 2017, the defendant appeared before Your Honor and entered a guilty plea. Sentencing is scheduled for March 5, 2018.

To date the following modifications have been made to the financial bond via Consent Orders:

- On January 9, 2015, the bond was increased to \$750,000 and the defendant's son, Eric Feliz, cosigned said bond;
- On April 1, 2016, the Citibank IRA account, and all restrictions for same, was removed from the bond;
- On April 20, 2016, the defendant's brother, Samuel Ravelo, cosigned the bond and was ordered to be Third Party Custodian; and
- On January 24, 2017, the painting was to be relocated to a gallery in New York, where it is permitted to be sold for no less than \$125,000. Should a sale commence, the United States government must be notified and the proceeds from such sale (minus 20% commission to the gallery) shall be placed in an escrow account.
- On March 21, 2017, a Status Conference was held before Your Honor and an issue surrounding the potential sale of the Florida condo securing the bail was addressed. The government and defense consented that should any proceeds from the potential tax sale of the property be received by defendant, the proceeds are to be turned over and held in escrow. The government and defendant counsel will address the percentage owned by defendant and submit an Order to the court as stated above.

In addition to the above bail modifications, as the defendant's travel condition continues to include New Jersey and New York City or as approved by Pretrial Services, a number of additional bail modifications have been submitted via Consent Order pertaining to the defendant's travel within the continental United States.

On November 20, 2017, the defendant appeared before Your Honor and entered a plea of guilty to counts 1 and 9 of the Indictment. Sentencing is scheduled for March 5, 2017.

Respectfully presenting petition for action of Court and for cause as follows:

**[SEE ATTACHED ADDENDUM]**

**PRAYING THAT THE COURT WILL ORDER the bail conditions be modified to include:**

- 1. Defendant is to comply with any/all federal, state and/or local laws relating to reporting a lost or stolen firearm;**
- 2. Defendant is to comply with any/all efforts of law enforcement to investigate lost firearm; and**
- 3. Defendant to provide any documentation/verification of efforts to comply with above to Pretrial Services.**


ORDER OF COURT

Considered and ordered this 20<sup>th</sup> day  
of December, 2017 and ordered filed  
and made a part of the records in the above  
case.

  
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HONORABLE KEVIN MCNULTY  
United States District Judge

I declare under penalty of perjury that the  
foregoing is true and correct.

Executed  
on November 29, 2017

  
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ELIZABETH G. CHARLESTON  
United States Pretrial Services Officer